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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

REBECCA TAYLOR, and C.T., a minor by  
 REBECCA TAYLOR, C.T.'s parent and  
 guardian, on behalf of themselves and all  
 others similarly situated,

Plaintiff,

v.

APPLE, INC.,

Defendant.

Case No. 5:20-cv-03906-RS

**STIPULATION EXTENDING BRIEFING  
 DEADLINES RE DEFENDANT'S MOTION  
 TO DISMISS; [PROPOSED] ORDER**

**CLASS ACTION**

District Judge Richard Seeborg  
 Courtroom 3, 17th Floor

Complaint Filed: June 12, 2020  
 Trial Date: Not Set

**JURY TRIAL DEMANDED**

**STIPULATION**

Plaintiffs Rebecca Taylor, and C.T., a minor by Rebecca Taylor, C.T.'s parent and guardian, on behalf of themselves and all others similarly situated ("Plaintiffs") and Defendant Apple, Inc. ("Defendant") hereby stipulate, pursuant to Civil L.R. 6-1 and 6-2 and subject to approval by the Court, for an extension of the deadlines to file opposition and reply memoranda regarding Defendant's Motion to Dismiss Plaintiffs' First Amended Complaint. (ECF No. 56). The proposed briefing schedule will impact the hearing date relating to Defendant's Motion to Dismiss, which is set for July 15, 2021, and so the Parties respectfully request a continuance of the hearing. The proposed extension will not impact other deadlines in this matter.

WHEREAS, Plaintiffs filed their First Amended Class Action Complaint on April 8, 2021 (ECF No. 48);

WHEREAS, on April 13, 2021, the Court granted the Parties' stipulation relating to a briefing schedule on Defendant's Motion to Dismiss and set the following deadlines:

- Defendant's Motion to Dismiss shall be due on May 10, 2021;
- Plaintiffs' Opposition to Defendant's Motion to Dismiss shall be due on June 11, 2021;
- Defendant's Reply in Support of its Motion to Dismiss shall be due on June 28, 2021;
- and
- Hearing on Defendant's Motion to Dismiss on July 15, 2021, at 1:30 p.m.

(ECF No. 50).

WHEREAS, on May 10, 2021, Defendant filed its Motion to Dismiss (ECF No. 56).

WHEREAS, due to a number of scheduling conflicts with the Plaintiffs' counsel primarily responsible for drafting the opposition brief, Plaintiffs have requested and Defendant has agreed to a revised briefing schedule for the opposition and reply memoranda.

WHEREAS, the Parties believe there is good cause for the proposed, revised briefing schedule on Defendant's Motion to Dismiss to permit the Parties additional time to file their opposition and reply briefs particularly because the deadlines will not impact any other deadlines in this matter as none have been set.

WHEREAS, the Parties have met and conferred, and believe there is good cause for the proposed motion to dismiss briefing schedule. This request is made in good faith, and is the first request for an extension since Defendant filed its Motion to Dismiss.

**ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED**, subject to the approval of the Court, that:

1. Plaintiffs' Opposition to Defendant's Motion to Dismiss shall be due on June 25, 2021.
2. Defendant's Reply in Support of its Motion to Dismiss shall be due on July 12, 2021.
3. The hearing on Defendant's Motion to Dismiss shall be heard, subject to the Court's availability, on July 29, 2021, at 1:30 p.m.

**NOW, THEREFORE**, this Agreement is entered into by and among the Parties, by and through their respective counsel and representatives.

Respectfully submitted,

Dated: June 9, 2021

BLOOD HURST & O'REARDON, LLP  
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By: /s/ Timothy G. Blood

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Dated: June 9, 2021

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**ECF CERTIFICATION**

The filing attorney attests that he has obtained concurrence regarding the filing of this document from the signatories to this document.

Dated: June 9, 2021

BLOOD HURST & O'REARDON, LLP

By: /s/ Timothy G. Blood

TIMOTHY G. BLOOD

**[PROPOSED] ORDER**

Having reviewed the above Stipulation Extending Briefing Deadlines re Defendant's Motion to Dismiss, IT IS HEREBY ORDERED that the Court finds that good cause exists for the entry of this Order. The schedule relating to Defendant's Motion to Dismiss is as follows:

1. Plaintiffs' Opposition to Defendant's Motion to Dismiss shall be due on **June 25, 2021.**
2. Defendant's Reply in Support of its Motion to Dismiss shall be due on **July 12, 2021.**
3. Defendant's Motion to Dismiss shall be heard on **July 29, 2021, at 1:30 p.m.**

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 9, 2021.

*s/ Timothy G. Blood*

TIMOTHY G. BLOOD